

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ELIZABETH CHAN, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
-against-	:	Case No. 23 Civ. 10365 (LJL)
	:	
UNITED STATES DEPARTMENT OF	:	
TRANSPORTATION, <i>et al.</i> ,	:	<u>NOTICE OF MOTION</u>
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that upon (1) the accompanying Memorandum of Law in Support of the Their Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment and (2) the Administrative Record, Defendants the U.S. Department of Transportation, the Federal Highway Administration, Shailen Bhatt, and Richard J. Marquis, by their attorney, Damian Williams, United States Attorney for the Southern District of New York, hereby move this Court for an order granting summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

Dated: April 1, 2024  
New York, New York

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

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